

DOCKETED**12-AAER-2C**

TN 72842

MAR 26 2014

From: [Ngo, Tuan@Energy](mailto:Ngo,Tuan@Energy)
To: [Energy - Docket Optical System;](#)
Subject: FW: CEC Consideration of Urinal Flush Levels
Date: Wednesday, March 26, 2014 11:22:53 AM

Hi, Can you please docket this e-mail to 12-aaer-2c. Thanks.
-Tuan Ngo-

From: Len Swatkowski [mailto:LSwatkowski@pmihome.org]
Sent: Tuesday, March 18, 2014 7:42 AM
To: Ngo, Tuan@Energy
Cc: Singh, Harinder@Energy; Jerry Desmond; Barbara Higgins
Subject: CEC Consideration of Urinal Flush Levels

Tuan,

This is just a short note following up on our call last week regarding urinal flush levels.

Per our comments submitted last October: "The IOU's had proposed different consumption rates for wall-mounted (0.125 gpf max) and floor-mounted urinals (0.5 gpf max). PMI would like to stress the point that the CEC should maintain the specifications in CALGreen and AB715 which has one urinal category at 0.5 gallons per flush. Also, the US EPA WaterSense labeling program for urinals sets the efficiency level at ≤ 0.5 gpf for this voluntary, performance-based third-party certification program. The 0.5 gpf level is the benchmark for this voluntary water efficiency program and is available in a variety of design choices in wall and floor mount configurations."

Anecdotal information from the field points to an increased level of maintenance needed to keep drain lines downstream from .125 urinals clear of struvite blockages. This also depends on the design of the overall plumbing system where additional upstream water sources (sinks, showers, etc.) can minimize this additional maintenance.

Again, PMI supports WaterSense certification and urinal flush rate of 0.5 gallons per flush for the CEC rulemaking.

Sincerely,
Len

Len Swatkowski

Technical Director
Plumbing Manufacturers International
1921-G Rohlwing Road
Rolling Meadows, IL 60008
p: 847.481.5500 x 105
f: 847.481.5501

c: 847-217-7212

Save a place on your calendar for the Fall PMI meeting, October 27-30, 2014 at the Westin O'Hare in Rosemont IL

PMI's Mission:

To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace.

To provide a forum for the exchange of information and industry education

To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes.

To enhance the plumbing industry's growth and expansion.